

SOUTH DELTA WATER AGENCY

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CALFED Bay-Delta Program
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Attn: Mr. Rick Breitenbach

The South Delta Water Agency hereby submits the attached comments on the CALFED's Draft Programmatic EIS/EIR. These are in addition to comments previously submitted.

Yours truly,


Alex Hildebrand

cc SDWA Board

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May 16, 1998 Draft

Comments on the CALFED DEIS by Alex Hildebrand for SDWA

Introduction

California is rapidly outgrowing its water supply. As a result of doing so without a balanced, multipurpose water management plan we have substantially degraded the state's water dependent environment. The creation of CALFED provides the first, and currently the only hope for developing a balanced and comprehensive plan for protection of the environment in the Delta, and in the Delta's watershed to the extent that doing so is feasible and compatible with meeting the other needs of our ever growing population. The CALFED's March Draft Environmental Impact Statement represents an enormous effort to produce a 30 year plan for this purpose.

Unfortunately, however, the effort is so complex and so controversial among parties with different perspectives that we do not yet have a clearly defined plan that can or should be adopted. If we adopted the plan that is now in the DEIS we wouldn't know what we had adopted. Does it or doesn't it include new surface storage, and, if so, how would the water yield from that storage compare to the anticipated water deficit at the end of the 30 year planning period? Would the new water supply be situated to optimize multiple benefits provided by the new water supply? How much environmental improvement is forecasted, and are the proposed environmental measures the most cost and water efficient and least disruptive way to achieve the goals? Does or doesn't the plan include a peripheral canal of what initial size, and how can we be sure the canal would be operated to protect the Delta and would not cause the public to lose interest in preserving the Delta? How much will the plan reduce the land and water now used to produce food and fiber? What will happen to the economy and the food supply if the next generation has a per capita allocation of water to grow food that is less than half its present value? To what extent does the enormous proliferation of non-native aquatic species preclude the recovery of desired populations of native species?

The plan must be improved so that it can be adopted, but it needs a lot of fixing.

Alternatives

Prudent selection of a "preferred alternative" can not be made until the alternatives are first redesigned to maximize benefit and minimize impacts. Alternative 2 can be improved for fishery, for export water quality, and for reduced earthquake risk. The current design does nothing to protect the Sacramento fish that flow with the water through Georgiana Slough to the center of the Delta. That flow through Georgiana Slough, and the screened Sacramento water are both proposed to flow through a part of the Delta that has deep peat soils and has the high tidal flows that bring in salt from the Bay, including the bromides that cause water treating problems. Alternative 2 should be redesigned so that flow through Georgiana Slough is greatly reduced, and the screened Sacramento water is kept further from the Bay by being directed down the South Fork of the Mokelumne and through the natural north-south eastside Delta channels to Middle River. Since the DEIS was prepared the CALFED has agreed to address these changes.

Alternative 3 improves export water quality by degrading Delta water quality. This violates the commitment to avoid "redirected impacts." Even if the canal is initially designed to deliver less export water than the old peripheral canal it can easily be enlarged. The new canal would cause all the same seepage and severance problems as the old canal, and would increase flooding on the upstream side of the canal in a major rain flood. There is no legal way to assure that the canal would be operated to benefit fishery and protect the Delta, instead of being operated to maximize export benefits while sacrificing the Delta.

Water Transfers

The proposed CALFED program and the CVPIA rely on reallocation of very large amounts of agricultural water to other uses. It is assumed that it is appropriate to substantially reduce the overall agricultural water supply by buying land and water from any willing seller. There is no concern for social interests that are not protected by market forces; no concern for the consequences of acquiring water from lands that are dedicated for protection of agricultural open space and crop production by county zoning ordinances, Williamson Act contracts, etc.; no concern over the impact on existing water uses when upstream sellers sell water they don't need, but which is used by downstream interests in the absence of the sale. The CALFED and CVPIA plans propose to make such purchases on San Joaquin tributaries to provide San Joaquin fish flows even though those flows could be provided at less cost and with no loss to any water user by recirculating Delta Mendota Canal water. When land is bought, the appurtenant water is taken from agricultural water use. The plan also proposes to fallow land in order to

reduce the salinization of soils on the westside of the San Joaquin Valley instead of providing the valley drain that was promised when the CVP was built. Water transfers merely shift water from one water user to another, yet the program addresses these reallocations of agricultural water as if transferred water is either "new water", or the new use, such as for producing computer chips has such a "high value" that the reduction in available water to produce food can be ignored. It refers to the proposed water transfers as increasing "water supply reliability" without acknowledging that the transfers merely shift reliability of supply from an agricultural use to another purpose of use. The commitment that urban, environmental, and agricultural needs would "get better together" has not been applied to agriculture.

Acquisition of Agricultural Lands for Wetlands and Shallow Water Habitat

The plan proposes to acquire roughly 200,000 acres of Delta agricultural land for wetlands and shallow water habitat. An ad hoc Delta group has been convened by Tom Zuckerman (CDWA) and provided with expertise from Margit Aramburu (Delta Protection Commission) and with participation by the Natural Heritage Institute. This group has identified measures to achieve the environmental goals in the Delta without taking much land from agriculture.

Inefficient Use of Scarce Potable Water

In less than 30 years, 40% of our population will be living in houses that have not yet been built. Yet we plan to continue using potable water to flush toilets and water gardens. There is a limited supply of the high quality source water desired for treatment to meet potable water standards. We should not squander that scarce supply for uses it does not benefit.

Water Supply

On May 14 the BDAC had a discussion between those who believe that CALFED can not succeed without a substantial increase in the developed water supply, and those who believe we should rely on "demand reduction". In this context "demand reduction" means relying on a substantial reallocation from the agricultural water supply in order to meet other needs.

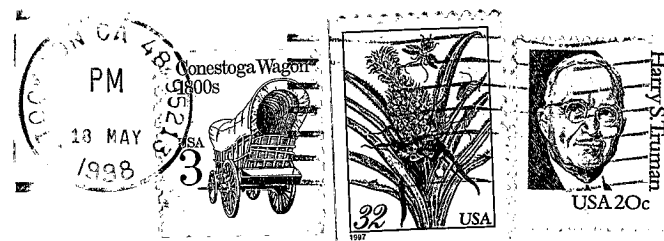
The current CALFED proposal is very non-committal about increasing the developed water supply. It focusses on considering offstream and subsurface water banking. It addresses storage capacity rather than water yield and says little about cost versus benefit. This approach is unlikely to lead to any substantial new developed water supply.

The only significant way to increase dry year supply is to capture water that is now released for flood control or is otherwise lost to beneficial use. This water must then be held for dry year use. Offstream and subsurface storage can not typically be filled fast enough to capture a large portion of a flood flow. Existing onstream reservoirs have typically been justified in part by the flood protections they provide. They have also usually been financed in substantial part by the power they produce. Offstream and subsurface storage projects provide less capability for flood capture and flood protection. Furthermore, they are power consumers instead of power generators. It is not proposed that they be operated to attenuate peak flood flows. It is, therefore, unlikely that the storage proposals now under consideration would be adequately effective in generating new supply, and sufficiently cost effective to have any likelihood of being built.

Conclusion

Better management of our environment and of our water and land resources is badly needed. But the CALFED program must be substantially improved in several respects before it is adopted.

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